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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SAMUEL B. JOHNSON, III,

Plaintiff,

v.

CHEVRON CORPORATION, CHEVRON
 CORPORATION LONG TERM DISABILITY
 PLAN ORGANIZATION, CHEVRON
 ENVIRONMENTAL MANAGEMENT
 COMPANY, CATHERINE DREW,
 KATHRYN M. GALLACHER, SUSAN J.
 SOLGER, SELLERS STOUGH, KRYSTAL
 TRAN, DEBBIE WONG, and GARY A.
 YAMASHITA,

Defendants.

Case No. C 07-05756 WHA

**DEFENDANTS' RESPONSE TO
 COURT'S JANUARY 7, 2008
 REQUEST FOR CLARIFICATION**

Defendants Chevron Corporation et al. (hereinafter collectively "Defendants"), hereby respond to the Court's January 7, 2008 Request for Clarification, as follows:

This matter is not at issue and no Defendant has appeared. Moreover, Defendants are filing this response pursuant to the Court's Order and do not intend for this response to be deemed as an appearance. Defendants' responsive pleadings, which will comprise of Motions to Dismiss rather than Answers, are required to be filed in approximately one month, on February 8, 2008.

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At this time, and given that this matter has just recently commenced, Defendants have not conducted discovery regarding Plaintiff's prior employment with, and complaint filed against, Morrison & Foerster and indeed, were unaware that Plaintiff had filed said prior similar charge. Accordingly, Defendants are unable to clarify for the Court, at this time, the role of Morrison & Foerster as such information was unknown to Defendants until Plaintiff's filing of his "Notice of Potential Conflict of Interest." However, Defendants are informed and believe that in addition to Morrison & Foerster, and now Defendants, Plaintiff has also previously filed a similar complaint against yet another employer. Accordingly, Defendants believe that Plaintiff may have engaged in a pattern and practice of routinely filing complaints of this nature against his employers and may use evidence of his prior employment and inclination toward the filing of complaints, in defense of Plaintiff's unfounded claims against Defendants in this matter.

Defendants have no objection or opposition to the Honorable William H. Alsup continuing to preside over this matter. Indeed, Plaintiff himself, in his "Notice of Potential Conflict of Interest," concedes that no conflict of interest exists in this matter and that he believes, as do the Defendants, that this Court "can remain impartial" in this matter. (Plaintiff's Notice of Possible Conflict of Interest, 3:26-4:4.)

Dated: January 11, 2008

FILICE BROWN EASSA & McLEOD LLP

By: /s/
 ROBERT D. EASSA
 DELIA A. ISVORANU
 Attorneys for Defendants